

July 29, 2011

Fiona M. Alexander,  
Associate Administrator  
Office of International Affairs  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
1401 Constitution Avenue NW  
Washington, DC 20230

RE: Request for Comments on Internet Assigned Numbers Authority Functions Contract

AusRegistry International, a global provider of domain name registry technology, software and consulting services and an active participant in Internet policy development, values the opportunity to comment on the Further Notice of Inquiry (FNOI) issued by the National Telecommunications and Information Administration (NTIA) regarding its proposed Statement of Work (SOW) for the new Internet Assigned Numbers Authority (IANA) functions contract.

AusRegistry International welcomes NTIA's:

- conclusion that the three core IANA functions should remain bundled and performed by a single entity;
- statement of its continued commitment to the multi-stakeholder process for dealing with Internet policy issues;
- agreement and dedication to separation between the executing of the IANA functions and policy development;
- undertaking to improve operations and communications such as automation of IANA root zone management, and inclusion of a dashboard for reporting metrics.

AusRegistry International expresses concern with Section C.2.2.1.3.2 of the proposed SOW. Section C.2.2.1.3.2 states: "For delegation requests for new generic TLDs (gTLDs) the contractor shall include documentation to demonstrate how the proposed string has received consensus support from relevant stakeholders and is supported by the global public interest." This proposal is inconsistent with the community-approved process for the introduction of new gTLDs represented in the Applicant Guidebook (AGB). Further, this language conflicts with Section C.2.2.1.1 which seeks to more clearly distinguish operational execution from policy development by the IANA functions contractor.

In closing, AusRegistry International appreciates the open and transparent manner in which NTIA has conducted the initial Notice of Inquiry (NOI) and this FNOI and thanks NTIA for its continued efforts to ensure the security and stability of the domain name system.

Regards,  
Krista Papac  
Chief Strategy Officer  
AusRegistry International